

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION**

JOYCE LONEY,

Plaintiff,

v.

HSBC CARD SERVICES, et al.

Defendants.

CIVIL ACTION NO.: 7:14-cv-00049-F

**AFFIDAVIT OF CAREN D. ENLOE**

**NOW COMES** the affiant and, after being duly sworn, does depose and say as follows:

1. I am Caren D. Enloe, and I represent the defendant Financial Recovery Services, Inc. ("FRS") in the above captioned matter.
2. On February 18, 2014, FRS was served with written discovery including Plaintiff's First Request for Set of Interrogatories Directed to Defendants, First Request for Admissions, and Request for Production of Documents and Things. A true and accurate copy of the same are attached hereto as **Exhibit "A"** and incorporated herein by reference.
3. On March 19, 2014, Plaintiff and FRS agreed that FRS' responses to Plaintiff's discovery would be due 30 days after the FRCP 26(f) conference was held. A true and accurate copy of the email exchange between FRS and Plaintiff is attached hereto as **Exhibit "B"** and incorporated herein by reference.
4. On or about January 31, 2015, Plaintiff served another set of Requests for Production of Documents on FRS. A true and accurate copy of the same are attached hereto as **Exhibit "C"** and incorporated by reference.

5. On February 23, 2015, FRS served plaintiff with its responses to Plaintiff's first set of discovery and on February 27, 2015, FRS served plaintiff with its responses to Plaintiff's second Requests for Production of Documents. A true and accurate copy of the same are attached hereto as **Exhibit "D"** and incorporated herein by reference.

**Further Affiant Sayeth Not.**

This the 17 day of March, 2015.

Caren D. Enloe  
Caren D. Enloe

STATE OF NC  
COUNTY OF Wake

Sworn to and subscribed before me this the  
12<sup>th</sup> day of March, 2015.

Jennifer L. Roach  
Notary Public  
My Commission Expires: 5/26/2019



## CERTIFICATE OF SERVICE

The undersigned hereby certifies that she served the foregoing document on the following via first class mail, postage prepaid as follows:

Joyce Loney  
6068 Haystack Rd.  
Dobson, NC 27017  
*Pro se plaintiff*

This the 12<sup>th</sup> day of March, 2015.

/s/ Caren D. Enloe  
Caren D. Enloe  
N.C. State Bar No. 17394  
SMITH DEBNAM NARRON DRAKE  
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*Attorneys for Defendant Financial Recovery Services, Inc.*